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May 31, 2016

Mr. Kenneth Bruno
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
320 W. Fourth Street, Suite 500
Los Angeles, CA 90013

Dear Mr. Bruno:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112 Operation and Maintenance Inspection of Southern California Gas Company's (SCG) Cathodic Protection (CP) Facilities in the San Joaquin Valley (Inspection Unit) on May 11-15, 2015. The inspection included a review of the Inspection Unit's cathodic protection and odorant records for calendar years 2013 and 2014 and random field inspections of pipeline facilities in Bakersfield and Visalia districts. SED staff also reviewed the Inspection Unit's Operator Qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED staff did not identify any probable violation of G.O. 112, Reference Title 49 Code of Federal Regulations (CFR), Part 192. However, SED noted a concern as described in the "Summary of Inspection Findings", which has been addressed in the attachment.

Please feel free to contact me at (213) 305-8660 if you have any questions or need additional information.

Sincerely,

W. Jeff Koskie

Cc: Kan Wai Tong, SED/GSRB
Durga Shrestha, SED/GSRB

Attachment

**Summary of Inspection Findings
2015 SCG San Joaquin Valley Inspection
May 11 - 15, 2015**

I. Concerns, Recommendations, and Observations Summary

1. §192.463 (a) External corrosion control: Cathodic protection.

“Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in [Appendix D](#) of this part. If none of these criteria is applicable, the cathodic protection system must provide a level of cathodic protection at least equal to that provided by compliance with one or more of these criteria.”

During field inspection of CP facilities, SED observed that the pipe-to-soil reads at the following locations as shown in the table were out of tolerance (low P/S reads) from its -0.850 volts criteria:

Area	Point	District	Read, V	Lower Limit, V
DIN 024	A	Visalia	-0.804	-0.850
OGCV 005	H	Visalia	-0.617	-0.670
VIS010	O	Visalia	-0.274	-0.541
PIX004	E	Visalia	-0.461	-0.474
PIX004	F	Visalia	-0.261	-0.422
CORC012	E	Visalia	-0.775	-0.850
ARM001	I	Visalia	-0.426	-0.500
DLN035	P	Bakersfield	-0.720	-0.850
DLN049	J	Bakersfield	-0.508	-0.576
DLN004	A	Bakersfield	-0.497	-0.850

SCG must implement a prompt corrective action to address the CP areas that are currently out of tolerance.

SCG Response:

SCG took prompt remedial action to address the out-of-tolerance CP areas identified above. All of these areas were brought into tolerance by July 21, 2015, less than 75 days after they were found out-of-tolerance.

Area	Point	District	Read, V	Lower Limit, V	SCG Response	Date SCG CP Area Brought Back Into Tolerance	SCG Remedial Action
DIN 024	A*	Visalia	-0.804	-0.850	In Tolerance	7/21/2015	Verified CP Area was Short Free and Shifted Criteria from 850mV to 100mV
OGCV 005	H	Visalia	-0.617	-0.670	In Tolerance	6/25/2015	Increased Current at Rectifier to Restore Output to Historic Levels
VIS010	O	Visalia	-0.274	-0.541	In Tolerance	5/29/2015	Increased Current at Rectifier to Restore Output to Historic Levels
PIX004	E	Visalia	-0.461	-0.474	In Tolerance	5/28/2015	Restored Service to Rectifier After Finding Breaker Off
PIX004	F	Visalia	-0.261	-0.422	In Tolerance	5/28/2015	Restored Service to Rectifier After Finding Breaker Off
CORC012	E	Visalia	-0.775	-0.850	In Tolerance	7/6/2015	Increased Current at Rectifier to Restore Output to Historic Levels
ARM001	I	Visalia	-0.426	-0.500	In Tolerance	5/18/2015	Restored Power to Rectifier After Service Interruption for Power Company Maintenance
DLN035	P	Bakersfield	-0.720	-0.850	In Tolerance	5/22/2015	Repaired and Rebonded Broken Electrolysis Jumper Bond
DLN049	J	Bakersfield	-0.508	-0.576	In Tolerance	6/16/2015	Cleared Electrical Short at Meter Set Assembly
DLN004	A	Bakersfield	-0.497	-0.850	In Tolerance	5/22/2015	Installed New Anodes

* CP Area DIN 024 was brought into tolerance on 7/21/2015, but Read Point A was no longer being used at that time. When a CP area's criteria is changed from 850mV to 100mV, read points are selected at those locations where the lowest amount of polarization has been measured, and new tolerances need to be established to meet the 100mV polarization criteria. In this case, read point A was deactivated since there were lower polarization read points for the 100mV polarization criteria. Therefore, two existing and one new test point with lower polarization levels are being used for routine annual inspections for this CP Area.

SCG shall continue to comply with Gas Standard 186.0135 Operation and Maintenance of Cathodic Protection Facilities by monitoring the Cathodic Protection Areas at least once each calendar year and take prompt remedial action for areas found out-of-tolerance. Troubleshooting orders will be automatically generated for each area found out-of-tolerance, and SCG will monitor the list of CP areas below tolerance and the remediation status.